

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

---

In re Cargill Meat Solutions Corp. Wage : 3:06-cv-00513-WJN  
and Hour Litigation :  
:

---

**JOINT MOTION FOR APPROVAL OF AN  
FLSA COLLECTIVE ACTION SETTLEMENT**

Plaintiff Farida Rahman (“Plaintiff”) and Defendant Cargill Meat Solutions Corporation (“Defendant”) move, pursuant to 29 U.S.C. §216(b), for judicial approval of a settlement reached between the parties, after extensive arms-length negotiations facilitated by a Court-appointed mediator, resolving all legal claims alleging wage and hour violations at Defendant’s Hazleton, Pennsylvania facility and bringing an end to the above-captioned consolidated action.

The attached Settlement Agreement contains the settlement terms, and the parties’ Memorandum of Law in support of this Motion, which the parties will file promptly in accordance with Local Civil Rule 7.5, will set forth the parties’ legal argument that the settlement is fair and reasonable and warrants this Court’s approval. Also, in conjunction with the joint Memorandum of Law, Plaintiffs’ undersigned counsel will simultaneously file a supplemental brief addressing the reasonableness of the attorney’s fees and litigation expenses provided under the Settlement Agreement.

**WHEREFORE**, the parties request that the Court sign and enter the accompanying proposed order approving the settlement of the above-captioned action.

Date: February 27, 2009

Respectfully submitted,

**FOR PLAINTIFFS:**

/s/ Peter Winebrake

Peter Winebrake, Esq.

THE WINEBRAKE LAW FIRM, LLC

Twining Office Center, Suite 114

715 Twining Road

Dresher, PA 19025

Ph: (215) 884-2491

/s/ Brian McCafferty

Brian McCafferty, Esq.

KENNY EGAN McCAFFERTY & YOUNG

3031C Walton Road, Suite 202

Plymouth Meeting, PA 19462

(610) 940-9099

/s/ Mary Ann Lucas

Todd O'Malley, Esq.

Mary Ann Lucas, Esq.

O'MALLEY & LANGAN, PC

Mulberry Professional Plaza

426 Mulberry Street

Scranton, PA 18503

(570) 344-2667

**FOR DEFENDANT:**

/s/ Joseph E. Tilson

Joseph E. Tilson, Esq.

Meckler Bulger Tilson Marick & Pearson LLP

123 North Wacker Drive, Suite 1800  
Chicago, IL 60606  
(312) 474-7880